

REMARKS

Upon entry of the instant Amendment, Claims 1-27 are pending. Claims 1, 9, 12, 15, 22, and 27 have been amended to more particularly point out Applicants' invention.

Claims 1-27 were rejected under 35 U.S.C. §102(e) as being anticipated by Ayala U.S. Patent No. 5,809,130 ("Ayala"). In order for there to be anticipation, each and every element of the claimed invention must be present in a single, prior reference. Applicants respectfully submit that the claimed invention is not taught, suggested, or implied by Ayala.

As discussed in the Specification, the present invention relates to an improved supplementary service for telephone system users. In particular, group pickup is a supplementary service often used by one member station of a group to answer or pick up telephone calls intended for or ringing at a different member station ***within the same call group***. The present invention allows supplementary services such as group pickup to be accomplished network-wide, with respect to both local and remote group members, i.e., ***a same group may be associated with local and remote servers***.

Thus, claim 1 has been amended to recite "wherein a call group associated with said call pickup station can have members associated with different ones of said one or more call group locations;" Claims 9 and 12 have been amended to recite "said call pickup party defining a group member;" and claim 15 has been amended to recite "that calling station and selected call pickup station may be associated with different servers and define member stations." Claim 22 has been amended to recite wherein call pickup stations and unanswered stations are associated with a same group and different servers" and claim 27 has been amended to recite a predetermined number of said plurality of telephony devices "associated with different ones of said plurality of servers."

In contrast, as discussed in response to the previous Official Action, Ayala does not appear to relate to a "group pickup system" at all. Indeed, Ayala explicitly states that "stations are not divided into groups. . ." Col. 2, lines 22-23. While the

Official Action in ¶10 notes that Ayala continues “dependent on physical proximity,” Ayala does not in fact, relate to groups at all.

For example, Ayala explicitly distinguishes from a group pickup system described in Romero, by stating, that “[u]nlike Romero wherein an individual may pick up a call directed to another station only if both stations are in the *same group*, the present invention provides an individual with the capability to pick up a call from any station, *regardless of its location*.” Col. 2, lines 23-26 (emphasis added). Thus, Ayala functions independent of a group.

In operation, Ayala provides for a caller’s call (telephone 14) to be queued at switch 12. The “subscriber” is then notified of the incoming communication. “Such notification may include manually or electronically paging the secondary party via a Public Address (PA) or digital paging system as well as generating a wireless notification signal for receipt by a mobile telephone or pager.” Col. 4, lines 58-62. Once the subscriber has received the page, he returns the call by picking up a telephone 16 and *dialing a log in number to connect to the switch*, to connect to the queued call.

Thus, Ayala does not appear to have anything to do with *group pickup*. Instead, Ayala provides for reaching a *particular* intended recipient via one or more CPE devices. To this end, Ayala provides a single central office switch which queues calls and then sends paging or public address messages to an *intended recipient, not a group member*. The user must then log in and be specifically recognized as the intended recipient in order to be connected. *The recipient, however, is a specific recipient and not in a “group” as that term is generally understood in the term “group pickup.”* That is, Ayala provides a pager-type system with a call connect feature, rather than a *group pickup feature*, as generally recited in the claims at issue.

As discussed in the Specification, a group pickup is a supplementary service often used by one member station of a group to answer or pick up telephone calls *intended for or ringing at a different member station within the same call group*. Such a service may be useful, for instance, where the intended call recipient has stepped away from the telephone or is generally not available to pick up the call, yet

the call must still be answered. As such, *any other member* of the call group is able to pick up the call. In Ayala, however, apparently only the intended recipient can pick up the call.

Furthermore, Applicant notes that the present claims all recite "one or more servers" or "more than one server" or "plurality of servers." Nowhere does Ayala teach a plurality of servers. Ayala discloses only two figures, FIG. 1 and FIG. 2. FIG. 2 is a flowchart; none of the items therein identifies a server. FIG. 1 illustrates a system 12, that has a "central office switch 10." Items 14, 18, 16, and 20, however, relate to either components of the switch 12 or "telephones." The text is similarly lacking in description of a plurality of servers.

Because Ayala does not relate to a group pickup system or a plurality of servers, the Examiner is respectfully requested to reconsider and withdraw the rejection of the claims.

For all of the above reasons, Applicants respectfully submit that the claims are in condition for allowance, which allowance is earnestly solicited.

Respectfully requested,


Francis G. Montgomery
Registration No. 41,202
Attorney for Applicants

Siemens Corporation
Intellectual Property Department
170 Wood Avenue South
Iselin, New Jersey 08830
(732) 321-3130